

TW Medical

Division of TradeWinds Trading Co., Inc.

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Dockets Management Branch (HFA-305)
Food & Drug Administration
5630 Fishers Lane
Room # 1061
Rockville, MD 20857

Re: Docket Nos. 92N-0297 and 88N-0258

Dar Sir/Madam:

We are a licensed drug wholesaler doing business in 43 states. We have a customer base of over 1,600 veterinary clinics and 400 physician's offices.

We purchase most of our inventory through several of the major full-line wholesalers (in addition to several smaller regional wholesalers). In all, we purchase approximately 40% of our inventory from smaller wholesale distributors who, in some cases, are not authorized distributors for the products they sell. We purchase directly from only seven (7) drug manufacturers.

We do not receive prescription drug pedigrees from full-line wholesalers or manufacturers.

If we were required to provide prescription drug pedigrees that go back to the manufacturer to our customers, we could do so only in those instances where we have purchased directly from the manufacturer or purchase from an "unauthorized distributor" who is able to provide that complete information to us. However, those "unauthorized distributors" will not be able to do so unless they purchased directly from the manufacturer, which is a fairly rare case. Since we do most of

our business with the major full wholesalers who do not provide any pedigrees, and because most "unauthorized distributors" will not be able to provide pedigrees back to the manufacturer, we will not be able legally to engage in 40% of the transactions in which we now engage.

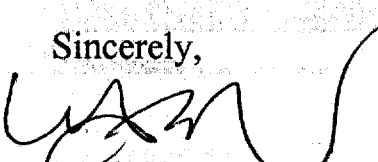
Virtually none of our customers presently do business with any of the full-line wholesalers. Many of our customers will be adversely affected if we are not able to supply them.

We have tried to become authorized distributors of these product lines, but we have been repeatedly turned down by the manufacturers.

Our company employs 11 people who will be put out of their jobs if the prescription drug pedigree requires that transactions be reported back to the manufacturer.

We support a return to the guidance issued by the FDA in August 1988 with respect to prescription drug pedigrees and authorized distributors.

Sincerely,



Mark Henry M. Ziller
President
TW Medical

CROSS FILE SHEET

FILE NO: 88N-0258/C77

SEE FILE NO: 92N-0297/C64